

IN THE DISTRICT COURT OF THE UNITED STATES
FOR THE DISTRICT OF SOUTH CAROLINA
SPARTANBURG DIVISION

Blockquarry Corp. f/k/a ISW Holdings, Inc.,

Plaintiff,

v.

Litchain Corp. and Gaffney Board of Public
Works,

Defendants.

C/A No.: 7:23-cv-01427-TMC

Gaffney Board of Public Works,

Counter-/Cross-Claimant,

v.

Blockquarry Corp. f/k/a ISW Holdings, Inc.,
Counterclaim Defendant, and Litchain Corp.,

Crossclaim-Defendant.

DECLARATION OF *SHAWN VAUGHT*

Pursuant to 28 U.S.C. § 1746, Shawn Vaught declares as follows:

1. I am over the age of eighteen years and competent to testify in the instant case.
2. I was retained by Pantheon Financial Management, LLC ("Pantheon") to assist in the removal of Bitcoin mining equipment from real property located at 150 Hyatt Street, Gaffney, South Carolina (the "Premises"). I am informed that Pantheon's affiliate was previously retained by Plaintiff Blockquarry Corp. f/k/a ISW Holdings, Inc. ("Blockquarry") for this same purpose and that the Premises relates to the same real property at issue in this litigation and owned by Defendant Gaffney Board of Public Works (the "Utility").

3. On certain dates in October and November 2023, I was present on the Premises to assist with the removal of Bitcoin mining equipment. All of the equipment removed from the Premises was transported to real property that I own located in Plaski County, Missouri near the city of Crocker (the “Crocker Site”). This equipment included (20) forty-foot shipping containers, numbered one through twenty (“container” or, collectively, containers”), with Bitcoin mining servers installed within them.¹

4. On or about December 21, 2023, I was provided a copy of an affidavit signed by Donnie Hardin (sometimes “Hardin Affidavit”). I am informed the Hardin Affidavit was filed and is maintained in the docket of this case as ECF No. 26-1.

5. In the affidavit, Mr. Hardin avers he is the ‘general manager’ of the Utility and that, as of May 23, 2023 (the date of signature), four entities claimed the right to possess miners installed in the pods located on the Premises. The affidavit attaches, as exhibits, inventories purportedly provided to the Utility by three of the entities claiming a right to possess those miners—*i.e.*, Blockquarry, Bitmain, and BEEQB, LLC. The inventories identify each claimed miner by serial number.

6. During January 2024, Pantheon performed an inventory of every Bitcoin mining server (commonly and hereinafter, “miners”) installed in the containers. The inventory process was directed and supervised by me, on behalf of Blockquarry (sometimes, the “Blockquarry Inventory”).

7. The results of the Blockquarry Inventory reveal anomalies, including that the inventory attached to Hardin Affidavit as Exhibit 1 (purportedly Bitmain’s miners) is incorrect. For example, the miners with the serial numbers in the document attached hereto as Exhibit I, are

¹ Containers numbered 11 and 12 were subsequently moved to a different location.

not present in *any* container removed from the Premises. Exhibit I was prepared under my supervision and direction. It identifies serial numbers of miners that were identified in Exhibit I of the Hardin Affidavit, but that are *not* present in any container removed from the Premises and, consequently, not present on the Premises when Blockquarry removed the containers.

[signature page follows]

I declare under penalty of perjury under the laws of the United States of America that the foregoing is true and correct.

FURTHER AFFIANT SAYETH NOT.

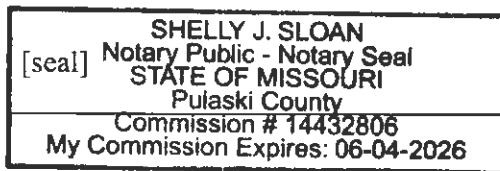
AFFIRMATION

Sworn before me on the 12th day of
January 2024.

Shelly J. Sloan

Notary Public for Pulaski County

My Commission expires: 06-04-2026



SHAWN VAUGHT

Shawn Vaught

Shawn Vaught, in his capacity as contractor of
Pantheon Financial Management, LLC

Executed on January 12, 2024.

POD 1	POD 2	POD 3	POD 4	POD 5	POD 6	POD 7
YNAHD4CBBJAJI0CV9	YNAHD4CBBJABE0CKW	YNAHD4CBBJABE0DWB	YNAHD4CBBJAJI032P	NGSBD4CBAAAJA0125	TWJQD4CBBJABJ0298	YNAHD4CBBJABE09PY
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YNAHD4CBBJAJI05ZC	YNAHD4CBBJAJI03MN	YNAHD4CBBJAJI034G	YNAHD4CBBJABE018V	KPMID4CBAABJA0030	YNAHD4CBBJAJI0E0H	YNAHD4CBBJABE0H5S
YNAHD4CBBJAJI0CWD	TWJQD4CBAABAH00GD		YNAHD4CBBJABE0196	KPMID4CBAAAJB1759	YNAHD4CBBJAJI0BKJ	YNAHD4CBBJABE0E5F
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POD8	POD 9	POD 13	POD 14	POD 15	POD 16	POD 18
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